

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

(1) FRANCES HARVEY,
ADMINISTRATRIX OF THE ESTATE
OF EARLENE FRANCES HARVEY,
DECEASED,

Plaintiff,

v.

Case No. 6:14-CV-00219-RAW

(1) LUIS V. GOROSPE, M.D.;
(2) WAGONER HOSPITAL AUTHORITY,
d/b/a WAGONER COMMUNITY HOSPITAL;
(3) QUORUM HEALTH RESOURCES, LLC;
(4) JANE DOES I-X; and (5) JOHN DOES I-X,

Defendants.

**PLAINTIFF'S RULE 30(B)(6) NOTICE TO TAKE DEPOSITION
OF CORPORATE REPRESENTATIVE(S)**

TO: Wagoner Hospital Authority,
d/b/a Wagoner Community Hospital
c/o Jason C. Rush, Esquire
Grant A. Fitz, Esquire
RODOLF & TODD, attorneys for Wagoner Hospital Authority,
d/b/a Wagoner Community Hospital
2000 Mid-Continent Tower
401 S. Boston Ave.
Tulsa, OK 74103-4014

Pursuant to Fed R. Civ. P. 30(b)(6), Plaintiff hereby notices the corporate designation deposition of Wagoner Hospital Authority, d/b/a Wagoner Community Hospital ("Wagoner Hospital"), and Plaintiff requests that Wagoner Hospital produce the individual or individuals most knowledgeable about, and to bring all records related to and/or necessary to provide complete corporate testimony regarding the topics listed below. This deposition will be taken on May 19,



2015, beginning at 9:30 o'clock a.m., at the offices of Logan & Lowry, LLP, 101 South Wilson Street, Vinita, Oklahoma 74301. Alternatively, at the request of Defendant, Plaintiff will agree to conduct the deposition at Wagoner Community Hospital, 1200 West Cherokee Street, Wagoner, Oklahoma 74467. This deposition will be recorded by stenographic means. Topics for inquiry will include but not be limited to:

1. The recommendations made and actions taken as a result of any peer review process utilized by Wagoner Community Hospital regarding Luis V. Gorospe, M.D. ("Dr. Gorospe") prior to the date of the alleged negligence.
2. The credentialing of physicians, including Dr. Gorospe, for the conduct of bariatric surgeries, including Roux-En-Y Gastric Bypass surgery.
3. The equipment and facilities utilized or available at Wagoner Community Hospital for bariatric surgeries, including Roux-En-Y Gastric Bypass surgery and the capabilities to conduct flexible upper endoscopies.
4. The training of nurses or other hospital staff in bariatric surgeries and recognizing and treating complications from bariatric surgeries.
5. The history of Dr. Gorospe, including any medical malpractice actions or allegations involving Dr. Gorospe.
6. The qualifications or accreditation of Wagoner Community Hospital concerning bariatric surgeries.
7. The investigation and results of any investigation respecting the competence of Dr. Gorospe before he was granted staff privileges.

8. The numbers and outcomes of bariatric surgeries, including Roux-En-Y Gastric Bypass surgeries at Wagoner Community Hospital.
9. Any instances of misconduct by Dr. Gorospe or behavior that was questioned by Wagoner Community Hospital.
10. All efforts undertaken by Wagoner Community Hospital to monitor the performance of Dr. Gorospe.
11. Any examples or instances of incompetent behavior by Dr. Gorospe.
12. Any reports of any staff, independent contractors, employees, or patients of Wagoner Community Hospital respecting Dr. Gorospe.
13. The doctors and qualifications of doctors cross-covering Dr. Gorospe's bariatric surgery patients.
14. Any consultations with Quorum Health Resources LLC regarding bariatric surgery credentialing.
15. The care and treatment of Earlene Frances Harvey, deceased at Wagoner Community Hospital, including any surgeries performed at Wagoner Community Hospital.

Dated this 7th day of May, 2015.

Respectfully submitted,

LOGAN & LOWRY, LLP
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(918) 256-7511
(918) 256-3187 (fax)
rrush@loganlowry.com

By: 

Robert Alan Rush, OBA #13342

- and -

E.C. Gilbreath, Esquire
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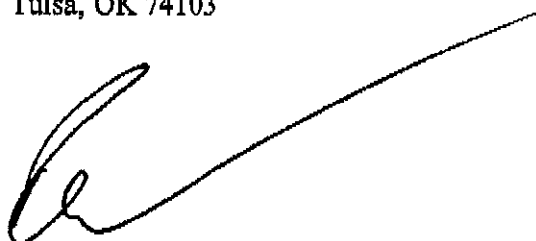
CERTIFICATE OF MAILING

I, ROBERT ALAN RUSH, do hereby certify that on this 7th day of May, 2015, I mailed a true and correct copy of the above and foregoing "Plaintiff's Rule 30(B)(6) Notice to Take Deposition of Corporate Representative(s)" to:

Jason C. Rush, Esquire
Grant A. Fitz, Esquire
RODOLF & TODD
2000 Mid-Continent Tower
401 South Boston Avenue
Tulsa, OK 74103

Timothy G. Best, Esquire
Benjamin D. Reed, Esquire
BEST & SHARP
Williams Center Tower I
One West Third Street, Suite 900
Tulsa, OK 74103

with proper postage thereon fully prepaid.



Robert Alan Rush